



Annual Title I Reminders

August 2016

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1. Time and Effort Logs

Federal funds may only be used for employee compensation if appropriate "time-and-effort" records are maintained. Time-and-effort reporting is important in ensuring that Federal program funds are used to pay only their proportionate share of personnel costs.

2 CFR 200.430(i)(1) states "Charges to Federal awards for salaries and wages must be based on records that accurately reflect the work performed. These records must: (vii) Support the distribution of the employee's salary or wages among specific activities or cost objectives if the employee works on more than one Federal award; a Federal award and non-Federal award; an indirect cost activity and a direct cost activity; two or more indirect activities which are allocated using different allocation bases; or an unallowable activity and a direct or indirect cost activity."

NDE recommends that subrecipients continue using the prior time and effort guidance from OMB circular A-87 to ensure adequate support of the distribution of their employee's salary and wages.

- a. Any personnel paid from Federal Funds must maintain a Time and Effort Log; sometimes called Personnel Activity Records (PARs). A Time and Effort Log is an after-the-fact report of actual activity of an employee. Logs must be signed by the employee **and** their supervisor or another person in a supervisory position who is familiar with the person's schedule such as building principal, HR representative, or superintendent. These logs must be kept on file and will be reviewed during ESEA/NCLB monitoring. Local auditors may also request to see the logs. **NOTE:** (1) Time and Effort logs are required for every staff member being paid with **any** source of Federal funds. (2) Substitute teachers being paid with Federal funds, must have a signed PAR. (3) Staff being paid stipends with Federal funds must have a signed PAR.
 - i. Monthly verifications are required if paid from multiple cost objectives and the schedule fluctuates.
 1. An employee is considered to work on multiple cost objectives if s/he works on:
 - a. More than one Federal award;
 - b. A Federal award and a non-Federal award;
 - c. An indirect cost activity and a direct cost activity;

- d. Two or more indirect cost activities which are allocated using different allocation bases; or
- e. An unallowable activity and a direct or indirect cost activity
- ii. Semiannual verifications are required if being paid from only one source or working on a single cost objective.

b. Nebraska's Substitute/Alternate Time and Effort Reporting System

- i. If an employee has **a set schedule, even if working on multiple cost objectives**, s/he may complete semiannual verifications. Verifications (schedule) must be signed by the employee **and** their supervisor or another person in a supervisory position who is familiar with the person's schedule, and kept on file.
- ii. Additional information regarding Time and Effort Logs can be found in the *NDE State and Federal Grants Management Guidance*, which can be found at [here](#).

2. Parent Notification

- a. Parents of students attending any school in a District receiving Title I funds may request, and the district will provide to the parents in a timely manner, information regarding the professional qualifications of the student's teacher(s) and paraprofessional(s). The notification that parents can request this information must be shared annually. This may be done in the schools' handbooks, newsletters, etc.

3. Parent Compacts

- a. Compacts meeting the ESEA/NCLB requirements are to be provided to Title I students and their parents at least annually. In a Schoolwide Program, this would include ALL students.
 - i. Compacts are to be reviewed annually and updated as needed.
 - ii. It is okay for Schoolwide Programs to include the compact in the Parent Handbook.
 - iii. Signatures by parents and participating students are optional, but strongly encouraged.

4. Title I Parent Involvement Policies

- a. Title I Parent Involvement Policies that meet ESEA/NCLB requirements must be reviewed annually and updated as needed. These policies are to be shared with parents of participating students—this means ALL students in a Schoolwide Program. Parent Involvement Policies are required for the district AND each Title I building. Though it is called a policy, Board approval is not required. (See ESEA/NCLB Monitoring Guide Checklist for Parent Policy requirements.)

5. Highly Qualified Paraprofessionals

- a. **PRIOR TO WORKING WITH STUDENTS, Title I Instructional paraprofessionals must meet ESEA/NCLB requirements.** Paraprofessional requirements and other para information can be found at [para](#).
 - i. In TAS buildings this includes any para funded by Title I.
 - ii. In a SW program, this includes **ALL** instructional paras.
- b. Building principals must annually certify in writing that paraprofessionals meet the requirements listed above. This information is to be kept on file in the building, but does not need to be submitted to the NDE Title I Office. Attestations will be reviewed during ESEA/NCLB monitoring. A sample attestation form is available at this [link](#). The use of this specific form is not required. It is only required that buildings have a signed statement on file.

6. Schoolwide Eligibility

- a. Schools having a poverty level of 40% or above are eligible to become Title I Schoolwide Programs.
- b. Schools that are eligible for, but don't already have a Schoolwide Program, may submit a "Title I Schoolwide Intent Form," by November 1st and use the 2016-17 school year to develop a schoolwide plan. If you have questions regarding Schoolwide Programs, contact Beth Wooster (beth.wooster@nebraska.gov or 402-471-2452).
- c. Information regarding Title I Schoolwide Programs is available on the NDE Title I webpage: <http://www.education.ne.gov/federalprograms/Title%20I%20Part%20A.html>

7. Non-Regulatory Guidance for Title I Fiscal Issues

(February 2008) can be found at the following link:

<http://www.ed.gov/programs/titleiparta/fiscalguid.doc>. This document contains information on the following topics:

- a. Maintenance of Effort
- b. Comparability
- c. Supplement, Not Supplant
- d. Carryover
- e. Consolidating Funds in Schoolwide Programs
- f. Grantback Requirements

NOTE: *Much of the information described in number 7, is also included in the [NDE State and Federal Grants Management Guidance](#).*

8. Please contact the NDE Title I Office if your district or school is intending to use Title I funds for Rtl (Response to Intervention), MTTS (Multi-Tiered Support System) or preschool, as there are specific guidelines to be followed.

- a. If Title I funds are used for preschool, Head Start Performance Standards and Nebraska's Rule 11 must be followed. Teaching Strategies Gold® data must be collected and reported at the Fall, Winter, and Spring checkpoints. (The summer checkpoint must also be completed if the program operates year round.)

9. Transact

- a. The Nebraska Department of Education has paid the license fee for all Nebraska School Districts for the 2016-17 school year to access the Transact website: <http://www.transact.com/>. The website contains numerous forms that are available in multiple languages. Forms include everything from required parent notifications, bullying incident report forms, emergency information cards, head lice information, field trip permissions, to forms that have been specifically designed for Nebraska regarding IDEA and ELL (i.e. Home Language surveys). (Any document with "NE" as part of the title is specific to Nebraska.)
 - i. If you haven't checked out this website, I strongly encourage you to do so. Anyone from a district can access the Transact website and districts may have multiple users. First time users will need to register for access.

10. Transition from NCLB to ESSA

- a. AYP ratings are frozen at 2015-16 levels and parent notices regarding a school being identified for Needs Improvement, Corrective Action, or Restructuring will NOT be required.
- b. It is not required to offer Public School Choice (PSC) to any *new* students; however, students who previously transferred to another school under NCLB must be allowed to remain in that school until the child has completed the highest grade in that school with the district continuing to provide or pay for the provision of transportation to and from the school of choice.
- c. Nebraska will NOT be requiring districts/schools to provide Supplemental Educational Services (SES) to eligible students; however, there will be questions included in the 2016-17 NCLB Consolidated Application regarding how the district will meet the needs of students who would be eligible for SES. Though SES is not required, districts may choose to continue offering these services to eligible students.
- d. Districts having one or more schools identified for Needs Improvement, Corrective Action, or Restructuring were previously required to set aside an amount equal to 20% of the District's Title I allocation for PSC and/or SES. This will no longer be required, however NDE encourages a set aside that is adequate to cover transportation costs for students remaining in a PSC building. (See PSC Information above.)
- e. Accountability funds for Districts having one or more schools identified for Needs Improvement, Corrective Action, or Restructuring will continue to be available for 2016-17. These funds will remain in a separate application and NDE hopes to have the application open around the same time as the NCLB Consolidated Application.
- f. A school or District identified for Needs Improvement, Corrective Action, or Restructuring must continue to implement previously identified interventions applicable to the school or District through the 2016-17 school year, except for PSC and SES, as outlined above.

11. Requests for Reimbursement

- a. Districts are encouraged to submit requests for reimbursement throughout the school year. The timeline may not be the same for every district. Some may choose to submit quarterly, while others may opt to submit monthly requests. It is advisable to submit requests for reimbursement more than once a year. Districts/ESUs have the option of submitting separate requests for salaries/benefits, and other expenditures. Providing appropriate documentation will speed up the review process. The following expenditures **always** require supporting documentation.
 - i. Credit card purchases
 - ii. Travel expenditures
 - iii. Petty cash purchases
 - iv. Reimbursement to individuals
 - v. Allowable field trips must include the educational value
 - vi. Generally, there is a very high burden of proof that paying for food and beverages with Federal funds is necessary to meet the goals and objectives of a Federal grant. There may be unique circumstances where the costs would be permissible because they are reasonable and necessary. To be considered for reimbursement, the district must provide a detailed explanation as to why the purchase is necessary with Federal funds
- b. Information regarding allowable Federal Title Program Expenses is available in the [NDE State and Federal Grant Management Guidance](#), beginning on page 38.



12. Ensuring Educational Stability for Children in Foster Care

- a. **Provisions take place on December 10, 2016**
- b. USDE Non-Regulatory Guidance and Dear Colleague Letters available at <http://www2.ed.gov/about/inits/ed/foster-care/index.html>
- c. Key points
 - i. Intended to minimize disruptions for children in foster care
 - ii. A child in foster care will remain in the child's school of origin, unless a determination is made that it is not in the child's best interest to remain in that school.
 - iii. If it is in the best interest for the child to enroll in a different school, the child will be immediately enrolled, even if the child is unable to produce records normally required for enrollment.
 - iv. Districts that receive Title I funds must develop and implement clear written procedures, in collaboration with the State or local child welfare agency, governing how transportation to maintain children in foster care in their school of origin, when in their best interest, will be provided, arranged, and funded for the duration of a child's time in foster care.
 - v. District must designate a point of contact (POC) regarding children in foster care.
 - vi. SEC 1112(c)(5)(B) states that LEAs must begin implementing the requirements regarding transportation for students in foster care by **December 10, 2016** (one year after the enactment of ESSA).

13. The chart below provides a list of ESEA/NCLB Reviewers and Title I Consultant Assignments, by ESU area, for the 2016-17 school year.

The ESEA/NCLB Reviewer is the person responsible for reviewing the ESEA/NCLB Consolidated Application and onsite monitoring. The Title I Consultant is the person who can respond to Title I specific questions.

--2016-17 ESEA/NCLB and TITLE I REVIEWER ASSIGNMENTS --		
ESU	NCLB REVIEWER	TITLE I CONSULTANT
1	Randy McIntyre	Randy McIntyre
2	Pat Frost	Pat Frost
3	Beth Wooster & Brad Conner	Beth Wooster & Brad Conner
4	Brooke David	Randy McIntyre
5	Pat Frost	Pat Frost
6	Terri Schuster	Karen Hardin
7	Pat Frost	Pat Frost
8	Karen Hardin	Karen Hardin
9	Cathy Mohnike	Cathy Mohnike
10	Cathy Mohnike	Cathy Mohnike
11	Jan Handa	Pat Frost
13	Brad Conner	Brad Conner
15	Karen Hardin	Karen Hardin
16	Cathy Mohnike	Cathy Mohnike
17	Brad Conner	Brad Conner
18	Randy McIntyre	Randy McIntyre
19	Beth Wooster	Beth Wooster

14. NDE Title I Listserv

- a. Occasionally, information regarding Title I is sent to the Title I listserv. These are not sent on a regular basis, but rather, when important information is needing to be shared.
 - i. We are in the process of updating the Title I listserv email addresses. If you no longer wish to receive email messages from the NDE Title I Office, please let us know and your email address will be removed.
 - ii. If someone else in your district or school would like to be added to the Title I listserv, please have them send an email to beth.wooster@nebraska.gov that includes their first and last name, school district, and position.

The ESEA/NCLB 3-Year Monitoring Schedule can be found [here](#).

An updated list of Title I Schoolwide Programs is available at [SWP](#).

Presentations

Administrators' Days Presentations from 2016 and 2015 and the July 29, 2014 Federal Programs Conference are available on the following webpage:

<http://www.education.ne.gov/federalprograms/Index.html>